

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

United States of America,

Plaintiff,

v.

Violations: 18 U.S.C. § 1349
18 U.S.C. § 1956(h)
18 U.S.C. § 1029(a)(3)
18 U.S.C. § 1028A(a)(1)

D-1 Toriano Adams,
D-2 Anthony Adams,
D-3 Devin Simmons,
D-4 Aatif Brown,
D-5 OD Williams,
D-6 Denico Adams,
D-7 Rodney Gist,
D-8 Tayan Jackson,

Case:2:18-cr-20641
Judge: Friedman, Bernard A.
MJ: Patti, Anthony P.
Filed: 09-20-2018 At 01:41 PM
SEALED MATTER (EK)

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

General Allegations

1. The "Free Band Gang" was a group of individuals throughout the Detroit metro area who engaged in largescale fraud at retail stores throughout the United States.

2. The defendants TORIANO ADAMS, ANTHONY ADAMS, DEVIN SIMMONS, AATIF BROWN, OD WILLIAMS, DENICO ADAMS, and

RODNEY GIST were residents of the Detroit, Michigan metro area and operated under the Free Band Gang name.

3. TAYAN JACKSON was a resident of Brooklyn, New York, and also maintained an apartment in Southfield, Michigan.

4. American Express, Bank of America, Bay Federal Credit Union, Capital One, Citibank, Commerce Bank, Fidelity, Fifth Third Bank, First Niagara Bank, First National Bank Alaska, Forum Credit Union, HSBC, JPMorgan Chase, Star Bank, U.S. Bank, Wells Fargo Bank, and Westpac Banking Corporation are financial institutions as defined in Title 18, United States Code, Section 20. These institutions offer a broad array of financial products and services, including credit card accounts.

5. A “cloned” credit card is an unauthorized copy of a functioning, legitimate credit card. The account information for the true card is acquired through a number of methods, including data breaches of stores where the true account holder used the actual credit card, spear phishing emails sent to the true account holder to induce them to reveal the account information, or skimming the magnetic strip of the true account holder’s credit card. The account information is then pressed on the front of a blank card and/or encoded on the magnetic strip on the back of a blank card to create the “cloned” credit card.

6. To “punch” or “key in” a credit card means to manually enter the account number and expiration date for the credit card into the sales register instead of using the magnetic strip on the back of the card.

COUNT ONE
(18 U.S.C. § 1349 –
Conspiracy to Commit Wire Fraud)

From in or about January 2015 through in or about September 2017, the exact dates being unknown to the grand jury, in the Eastern District of Michigan and elsewhere, the defendants,

TORIANO ADAMS
ANTHONY ADAMS
DEVIN SIMMONS
AATIF BROWN
OD WILLIAMS
DENICO ADAMS
RODNEY GIST
TAYAN JACKSON

along with others known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree to commit certain offenses against the United States, namely wire fraud, in violation of 18 U.S.C. § 1343.

Object of the Conspiracy

The object of the conspiracy was for the defendants to fraudulently enrich themselves through a scheme and artifice to defraud by obtaining, without authorization, credit and debit account information belonging to other persons and

then using the account information to purchase items without the authorization of the true account holders.

Manner and Means

In furtherance of the conspiracy, and to affect the object and purposes thereof, the defendants, and others known and unknown to the grand jury, used the following manner and means, including but not limited to the following:

1. The defendants obtained the credit and debit account information of other persons from internet “dump” websites and other locations through which people buy and sell stolen accounts and other personally identifying information in bulk.
2. The defendants shared the credit and debit account information of other persons obtained without authorization with each other.
3. The defendants produced and possessed cloned credit cards on which the account information obtained without authorization was either embossed on the front of the card and/or encoded on the magnetic strip on the back of the card.
4. The defendants traveled, alone or in small groups, from the Detroit metro area to cities throughout the United States where they targeted Walmart stores in the surrounding areas.

5. The defendants used the cloned credit cards at the Walmart stores to purchase items without the authorization of the true account holder. Primarily, the defendants used the cloned credit cards to purchase gift cards from the Walmart stores on which they loaded \$500 per card and other personal items.

6. The defendants induced store employees to “punch” or “key in” the account information for the cloned credit card directly into the register by communicating that the magnetic strip on the back of the cloned credit card was not working properly.

7. When using the cloned credit cards at stores throughout the United States, the defendants knowingly transmitted and caused to be transmitted in interstate commerce, by means of wire communication, certain writings, signs, signals, pictures, and sounds.

Overt Acts

In furtherance of the conspiracy, and to affect the object and purposes thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed various overt acts, including but not limited to the following:

October 6, 2016: Washington, DC

1. On or about October 6, 2016, TORIANO ADAMS, OD WILLIAMS, and DEVIN SIMMONS used cloned Compass Bank credit cards at Walmart store #5936, located at 1500 B Cornerside Boulevard, Vienna, Virginia, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|--------|---------|----------|-----------------|----------------|
| 5936 | Vienna | 10/6/16 | 12:58 pm | 1,514.82 | 6327 |
| 5936 | Vienna | 10/6/16 | 1:01 pm | 1,514.82 | 0204 |

2. On or about October 6, 2016, TORIANO ADAMS, OD WILLIAMS, and DEVIN SIMMONS used cloned Compass Bank credit cards at Walmart store #5880, located at 11181 Lee Highway, Fairfax, Virginia, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|---------|---------|---------|-----------------|----------------|
| 5880 | Fairfax | 10/6/16 | 1:54 pm | 1,015.68 | 7167 |
| 5880 | Fairfax | 10/6/16 | 1:58 pm | 1,514.82 | 5377 |

3. On or about October 6, 2016, at approximately 3:38 pm, TORIANO ADAMS, OD WILLIAMS, and DEVIN SIMMONS used a cloned Compass Bank credit card ending in 8763 at Walmart store #3573, located at 9401 Liberia

Avenue, Manassas, Virginia, to purchase \$1,514.82 in items without the authorization of the true account holder.

4. On or about October 6, 2016, TORIANO ADAMS, OD WILLIAMS, and DEVIN SIMMONS used cloned Compass Bank credit cards at Walmart store #3639, located at 24635 Dulles Landing Drive, Dulles, Virginia, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|--------|---------|---------|-----------------|----------------|
| 3639 | Dulles | 10/6/16 | 6:42 pm | 1,514.82 | 2273 |
| 3639 | Dulles | 10/6/16 | 6:45 pm | 1,519.82 | 2996 |
| 3639 | Dulles | 10/6/16 | 6:46 pm | 1,011.94 | 3767 |
| 3639 | Dulles | 10/6/16 | 6:49 pm | 1,515.82 | 9180 |

October 8, 2016: St. Louis

5. On or about October 8, 2016, RODNEY GIST used cloned Compass Bank credit cards at Walmart store #1188, located at 11900 St Charles Rock Road, Bridgeton, Missouri, to purchase items without the authorization of the true account holder:

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|-----------|---------|----------|-----------------|----------------|
| 1188 | Bridgeton | 10/8/16 | 11:25 am | 1,011.44 | 8044 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1188 | Bridgeton | 10/8/16 | 11:29 am | 1,009.88 | 7502 |
| 1188 | Bridgeton | 10/8/16 | 11:36 am | 1,009.88 | 1550 |

October 9, 2016: Oklahoma City

6. On or about October 9, 2016, ANTHONY ADAMS and AATIF BROWN used cloned Compass Bank credit cards at Walmart store #2804, located at 1801 Belle Isle Boulevard, Oklahoma City, Oklahoma, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|---------------|-------------|-------------|------------------------|-----------------------|
| 2804 | Oklahoma City | 10/9/16 | 5:27 pm | 1,520.81 | 7823 |
| 2804 | Oklahoma City | 10/9/16 | 5:30 pm | 1,518.94 | 3840 |
| 2804 | Oklahoma City | 10/9/16 | 5:31 pm | 1,514.82 | 6532 |
| 2804 | Oklahoma City | 10/9/16 | 5:36 pm | 1,514.82 | 7668 |
| 2804 | Oklahoma City | 10/9/16 | 5:39 pm | 1,569.76 | 6896 |
| 2804 | Oklahoma City | 10/9/16 | 5:52 pm | 1,964.82 | 8243 |
| 2804 | Oklahoma City | 10/9/16 | 5:59 pm | 1,964.82 | 7668 |
| 2804 | Oklahoma City | 10/9/16 | 6:04 pm | 1,964.82 | 5386 |
| 2804 | Oklahoma City | 10/9/16 | 6:07 pm | 1,969.82 | 5550 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|---------------|---------|---------|-----------------|----------------|
| 2804 | Oklahoma City | 10/9/16 | 6:13 pm | 1,964.82 | 7768 |
| 2804 | Oklahoma City | 10/9/16 | 6:15 pm | 1,514.82 | 3459 |
| 2804 | Oklahoma City | 10/9/16 | 6:22 pm | 1,514.82 | 1609 |

7. On or about October 9, 2016, at approximately 9:28 p.m., ANTHONY ADAMS and AATIF BROWN used a cloned Compass Bank credit card ending in 2176 at Walmart store #5286, located at 9320 North Pennsylvania Place, The Village, Oklahoma, to purchase \$1,514.82 in items without the authorization of the true account holder.

October 11, 2016: Philadelphia

8. On or about October 11, 2016, TORIANO ADAMS and DEVIN SIMMONS used cloned HSBC credit cards at Walmart store #5891, located at 2200 Wheatsheaf Lane, Philadelphia, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|--------------|----------|---------|-----------------|----------------|
| 5891 | Philadelphia | 10/11/16 | 8:39 pm | 1,009.88 | 4957 |
| 5891 | Philadelphia | 10/11/16 | 8:42 pm | 1,009.88 | 4957 |
| 5891 | Philadelphia | 10/11/16 | 8:45 pm | 1,009.88 | 4913 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 5891 | Philadelphia | 10/11/16 | 8:47 pm | 1,009.88 | 4913 |
| 5891 | Philadelphia | 10/11/16 | 8:51 pm | 1,009.88 | 6786 |

9. On or about October 11, 2016, TORIANO ADAMS and DEVIN SIMMONS used cloned HSBC and Compass Bank credit cards at Walmart store #5469 located at 299 Valley Gate Drive, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5649 | Warrington | 10/11/16 | 10:29 pm | 1,009.88 | 6328 |
| 5649 | Warrington | 10/11/16 | 10:31 pm | 1,009.88 | 6328 |
| 5649 | Warrington | 10/11/16 | 10:32 pm | 1,012.38 | 9055 |
| 5649 | Warrington | 10/11/16 | 10:35 pm | 1,516.90 | 5195 |
| 5649 | Warrington | 10/11/16 | 10:37 pm | 1,009.88 | 6786 |
| 5649 | Warrington | 10/11/16 | 10:38 pm | 1,009.88 | 9856 |

October 12-13, 2016: Omaha

10. On or about October 12, 2016, ANTHONY ADAMS and AATIF BROWN used cloned HSBC credit cards at Walmart store #1637, located at 6304

North 99th Street, Omaha, Nebraska, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1637 | Omaha | 10/12/16 | 8:02 pm | 1,013.72 | 5358 |
| 1637 | Omaha | 10/12/16 | 8:04 pm | 1,009.88 | 6424 |
| 1637 | Omaha | 10/12/16 | 8:05 pm | 1,009.88 | 7773 |
| 1637 | Omaha | 10/12/16 | 8:08 pm | 1,009.88 | 7555 |
| 1637 | Omaha | 10/12/16 | 8:08 pm | 1,009.88 | 6918 |
| 1637 | Omaha | 10/12/16 | 8:09 pm | 1,009.88 | 2044 |
| 1637 | Omaha | 10/12/16 | 8:10 pm | 1,009.88 | 6918 |
| 1637 | Omaha | 10/12/16 | 8:12 pm | 1,009.88 | 6918 |
| 1637 | Omaha | 10/12/16 | 8:12 pm | 1,009.88 | 4101 |
| 1637 | Omaha | 10/12/16 | 8:13 pm | 1,009.88 | 3181 |
| 1637 | Omaha | 10/12/16 | 8:15 pm | 1,009.88 | 6918 |
| 1637 | Omaha | 10/12/16 | 8:15 pm | 1,009.88 | 4289 |
| 1637 | Omaha | 10/12/16 | 8:16 pm | 1,009.88 | 6918 |
| 1637 | Omaha | 10/12/16 | 8:18 pm | 1,009.88 | 6918 |

11. On or about October 13, 2016, ANTHONY ADAMS and AATIF BROWN used cloned HSBC credit cards at Walmart store #4358, located at 1606 South 72nd Street, Omaha, Nebraska, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 4358 | Omaha | 10/13/16 | 9:55 am | 1,013.88 | 3987 |
| 4358 | Omaha | 10/13/16 | 9:58 am | 1,046.00 | 9486 |
| 4358 | Omaha | 10/13/16 | 10:01 am | 1,009.88 | 0148 |
| 4358 | Omaha | 10/13/16 | 10:02 am | 1,009.88 | 0148 |
| 4358 | Omaha | 10/13/16 | 10:04 am | 1,009.88 | 0148 |
| 4358 | Omaha | 10/13/16 | 10:05 am | 1,009.88 | 0148 |
| 4358 | Omaha | 10/13/16 | 10:07 am | 1,009.88 | 1375 |
| 4358 | Omaha | 10/13/16 | 10:15 am | 1,257.59 | 0148 |

12. On or about October 13, 2016, ANTHONY ADAMS and AATIF BROWN used cloned HSBC credit cards at Walmart store #5361, located at 12850 L Street, Omaha, Nebraska, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5361 | Omaha | 10/13/16 | 10:43 am | 1,009.88 | 0148 |
| 5361 | Omaha | 10/13/16 | 10:45 am | 1,009.88 | 0148 |
| 5361 | Omaha | 10/13/16 | 10:47 am | 1,009.88 | 9741 |
| 5361 | Omaha | 10/13/16 | 10:50 am | 1,009.88 | 2932 |
| 5361 | Omaha | 10/13/16 | 10:53 am | 1,009.88 | 2978 |
| 5361 | Omaha | 10/13/16 | 10:57 am | 1,009.88 | 5034 |

13. On or about October 13, 2016, ANTHONY ADAMS and AATIF BROWN used a cloned HSBC credit card at Walmart store #4138, located at 13105 Birch Drive, Omaha, Nebraska, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 4138 | Omaha | 10/13/16 | 11:18 am | 1,011.46 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:24 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:28 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:30 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:32 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:34 am | 1,009.88 | 1461 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 4138 | Omaha | 10/13/16 | 11:36 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:38 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:40 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:44 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:47 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:49 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:51 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:52 am | 1,009.88 | 1461 |
| 4138 | Omaha | 10/13/16 | 11:54 am | 1,009.88 | 1461 |

14. On or about October 13, 2016, ANTHONY ADAMS and AATIF BROWN used cloned HSBC credit cards at Walmart store #1637, located at 6304 North 99th Street, Omaha, Nebraska, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1637 | Omaha | 10/13/16 | 12:17 pm | 1,009.88 | 1461 |
| 1637 | Omaha | 10/13/16 | 12:21 pm | 1,011.56 | 2424 |
| 1637 | Omaha | 10/13/16 | 12:22 pm | 1,009.88 | 8935 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1637 | Omaha | 10/13/16 | 12:23 pm | 1,009.88 | 1461 |

15. On or about October 13, 2016, ANTHONY ADAMS and AATIF BROWN used cloned HSBC credit cards at Walmart store #1671, located at 8525 South 71st Plaza, Papillion, Nebraska, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1671 | Papillion | 10/13/16 | 12:53 pm | 1,009.88 | 1461 |
| 1671 | Papillion | 10/13/16 | 12:55 pm | 1,009.88 | 1461 |
| 1671 | Papillion | 10/13/16 | 12:56 pm | 1,009.88 | 6284 |
| 1671 | Papillion | 10/13/16 | 12:57 pm | 1,009.88 | 1461 |
| 1671 | Papillion | 10/13/16 | 12:59 pm | 1,009.88 | 1461 |
| 1671 | Papillion | 10/13/16 | 1:09 pm | 1,009.88 | 9654 |
| 1671 | Papillion | 10/13/16 | 1:11 pm | 1,009.88 | 1620 |
| 1671 | Papillion | 10/13/16 | 1:12 pm | 1,009.88 | 1191 |

October 16, 2016: Myrtle Beach, South Carolina

16. On or about October 16, 2016, DENICO ADAMS and RODNEY GIST used cloned HSBC and Compass Bank credit cards at Walmart store #586,

located at 2709 Church Street, Conway, South Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 586 | Conway | 10/16/16 | 3:30 pm | 1,009.88 | 4127 |
| 586 | Conway | 10/16/16 | 3:32 pm | 1,009.88 | 4127 |
| 586 | Conway | 10/16/16 | 3:35 pm | 1,015.20 | 1789 |
| 586 | Conway | 10/16/16 | 3:38 pm | 1,009.88 | 5785 |

17. On or about October 16, 2016, DENICO ADAMS and RODNEY GIST used cloned HSBC credit cards at Walmart store #2712, located at 541 Seaboard Street, Myrtle Beach, South Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 2712 | Myrtle Beach | 10/16/16 | 6:26 pm | 1,009.88 | 4127 |
| 2712 | Myrtle Beach | 10/16/16 | 6:29 pm | 1,022.55 | 7031 |
| 2712 | Myrtle Beach | 10/16/16 | 6:30 pm | 1,009.88 | 2894 |
| 2712 | Myrtle Beach | 10/16/16 | 6:31 pm | 1,009.88 | 7031 |
| 2712 | Myrtle Beach | 10/16/16 | 6:32 pm | 1,009.88 | 2894 |
| 2712 | Myrtle Beach | 10/16/16 | 6:34 pm | 1,009.88 | 7031 |

18. On or about October 16, 2016, DENICO ADAMS and RODNEY GIST used cloned HSBC credit cards at Walmart store #5087, located at 550 Highway 17 N, North Myrtle Beach, South Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|--------------------|----------|---------|-----------------|----------------|
| 5087 | North Myrtle Beach | 10/16/16 | 8:55 pm | 1,009.88 | 6934 |
| 5087 | North Myrtle Beach | 10/16/16 | 8:57 pm | 1,009.88 | 6934 |
| 5087 | North Myrtle Beach | 10/16/16 | 8:58 pm | 1,031.75 | 7031 |
| 5087 | North Myrtle Beach | 10/16/16 | 8:59 pm | 1,009.88 | 6934 |
| 5087 | North Myrtle Beach | 10/16/16 | 9:01 pm | 1,009.88 | 1273 |

October 17, 2016: Kansas City

19. On or about October 17, 2016, TORIANO ADAMS, DEVIN SIMMONS, and OD WILLIAMS used cloned HSBC credit cards at Walmart store #2857, located at 8551 North Boardwalk Avenue, Kansas City, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|-------------|----------|----------|-----------------|----------------|
| 2857 | Kansas City | 10/17/16 | 12:50 pm | 1,020.69 | 3885 |
| 2857 | Kansas City | 10/17/16 | 12:53 pm | 1,009.88 | 3885 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2857 | Kansas City | 10/17/16 | 12:56 pm | 1,009.88 | 3885 |
| 2857 | Kansas City | 10/17/16 | 12:57 pm | 1,009.88 | 3730 |
| 2857 | Kansas City | 10/17/16 | 12:59 pm | 1,051.81 | 3730 |
| 2857 | Kansas City | 10/17/16 | 12:59 pm | 1,009.88 | 3885 |
| 2857 | Kansas City | 10/17/16 | 1:06 pm | 1,019.07 | 5354 |
| 2857 | Kansas City | 10/17/16 | 1:08 pm | 1,009.88 | 5354 |

20. On or about October 17, 2016, TORIANO ADAMS, DEVIN SIMMONS, and OD WILLIAMS used cloned HSBC and Compass Bank credit cards at Walmart store #486, located at 12801 Kansas Avenue, Bonner Springs, Kansas, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|----------------|-------------|-------------|------------------------|-----------------------|
| 486 | Bonner Springs | 10/17/16 | 2:16 pm | 1,009.88 | 5354 |
| 486 | Bonner Springs | 10/17/16 | 2:18 pm | 1,009.88 | 5354 |
| 486 | Bonner Springs | 10/17/16 | 2:21 pm | 1,515.32 | 7270 |
| 486 | Bonner Springs | 10/17/16 | 2:23 pm | 1,516.32 | 7739 |
| 486 | Bonner Springs | 10/17/16 | 2:25 pm | 1,514.82 | 5354 |

21. On or about October 17, 2016, TORIANO ADAMS, DEVIN SIMMONS, and OD WILLIAMS used cloned HSBC credit cards at Walmart store #4611, located at 5701 Silverheel Street, Shawnee, Kansas, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 4611 | Shawnee | 10/17/16 | 2:40 pm | 1,009.88 | 3885 |
| 4611 | Shawnee | 10/17/16 | 2:41 pm | 1,514.82 | 5354 |
| 4611 | Shawnee | 10/17/16 | 2:43 pm | 1,009.88 | 3885 |
| 4611 | Shawnee | 10/17/16 | 2:43 pm | 1,514.82 | 5354 |
| 4611 | Shawnee | 10/17/16 | 2:46 pm | 1,554.12 | 3730 |
| 4611 | Shawnee | 10/17/16 | 2:47 pm | 1,523.03 | 7739 |

22. On or about October 17, 2016, TORIANO ADAMS, DEVIN SIMMONS, and OD WILLIAMS used cloned HSBC credit cards at Walmart store #4475, located at 395 North K 7 Highway, Olathe, Kansas, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 4475 | Olathe | 10/17/16 | 3:06 pm | 1,009.88 | 3885 |
| 4475 | Olathe | 10/17/16 | 3:08 pm | 1,009.88 | 3885 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 4475 | Olathe | 10/17/16 | 3:09 pm | 1,664.82 | 3730 |
| 4475 | Olathe | 10/17/16 | 3:11 pm | 1,009.88 | 3885 |
| 4475 | Olathe | 10/17/16 | 3:12 pm | 1,009.88 | 3885 |
| 4475 | Olathe | 10/17/16 | 3:12 pm | 1,514.82 | 0457 |
| 4475 | Olathe | 10/17/16 | 3:15 pm | 1,597.57 | 7739 |
| 4475 | Olathe | 10/17/16 | 3:15 pm | 1,009.88 | 1902 |
| 4475 | Olathe | 10/17/16 | 3:22 pm | 1,519.12 | 2361 |
| 4475 | Olathe | 10/17/16 | 3:24 pm | 1,514.82 | 2361 |
| 4475 | Olathe | 10/17/16 | 3:29 pm | 1,514.82 | 2361 |

23. On or about October 17, 2016, TORIANO ADAMS, DEVIN SIMMONS, and OD WILLIAMS used cloned HSBC credit cards at Walmart store #5180, located at 10303 Metcalf Avenue, Overland Park, Kansas, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|---------------|-------------|-------------|------------------------|-----------------------|
| 5180 | Overland Park | 10/17/16 | 4:27 pm | 1,009.88 | 2361 |
| 5180 | Overland Park | 10/17/16 | 4:29 pm | 1,514.82 | 1902 |

24. On or about October 17, 2016, TORIANO ADAMS, DEVIN SIMMONS, and OD WILLIAMS used cloned HSBC credit cards at Walmart store #577, located at 13600 South Alden Street, Olathe, Kansas, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 577 | Olathe | 10/17/16 | 5:05 pm | 1,514.82 | 1902 |
| 577 | Olathe | 10/17/16 | 5:07 pm | 1,514.82 | 0457 |
| 577 | Olathe | 10/17/16 | 5:07 pm | 1,514.82 | 1902 |
| 577 | Olathe | 10/17/16 | 5:08 pm | 1,517.40 | 7739 |
| 577 | Olathe | 10/17/16 | 5:11 pm | 1,514.82 | 7739 |
| 577 | Olathe | 10/17/16 | 5:12 pm | 1,525.71 | 0457 |
| 577 | Olathe | 10/17/16 | 5:13 pm | 1,514.82 | 1902 |
| 577 | Olathe | 10/17/16 | 5:13 pm | 1,514.82 | 2361 |
| 577 | Olathe | 10/17/16 | 5:16 pm | 1,514.82 | 2361 |
| 577 | Olathe | 10/17/16 | 5:19 pm | 1,514.82 | 7739 |
| 577 | Olathe | 10/17/16 | 5:21 pm | 1,514.82 | 2361 |
| 577 | Olathe | 10/17/16 | 5:25 pm | 1,514.82 | 1902 |
| 577 | Olathe | 10/17/16 | 5:27 pm | 1,516.44 | 2361 |

October 18, 2016: Pittsburgh

25. On or about October 18, 2016, OD WILLIAMS and one or more co-conspirator(s) used cloned HSBC credit cards at Walmart store #1820, located at 1 Hilltop Plaza, Kittanning, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|------------|----------|---------|-----------------|----------------|
| 1820 | Kittanning | 10/18/16 | 5:48 pm | 1,514.82 | 6748 |
| 1820 | Kittanning | 10/18/16 | 5:50 pm | 1,042.36 | 9028 |
| 1820 | Kittanning | 10/18/16 | 5:51 pm | 1,514.82 | 6748 |
| 1820 | Kittanning | 10/18/16 | 5:54 pm | 1,514.82 | 6748 |
| 1820 | Kittanning | 10/18/16 | 5:57 pm | 1,514.82 | 6748 |
| 1820 | Kittanning | 10/18/16 | 5:57 pm | 1,011.67 | 3384 |

26. On or about October 18, 2016, OD WILLIAMS and one or more co-conspirator(s) used cloned HSBC credit cards at Walmart store #2318, located at 3100 Oakland Avenue, Indiana, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|---------|----------|---------|-----------------|----------------|
| 2318 | Indiana | 10/18/16 | 7:03 pm | 1,514.82 | 9028 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2318 | Indiana | 10/18/16 | 7:06 pm | 1,514.82 | 9028 |
| 2318 | Indiana | 10/18/16 | 7:08 pm | 1,514.82 | 9028 |
| 2318 | Indiana | 10/18/16 | 7:11 pm | 1,551.54 | 5950 |
| 2318 | Indiana | 10/18/16 | 7:12 pm | 1,514.82 | 0261 |
| 2318 | Indiana | 10/18/16 | 7:14 pm | 1,514.82 | 0261 |
| 2318 | Indiana | 10/18/16 | 7:14 pm | 1,514.82 | 5950 |
| 2318 | Indiana | 10/18/16 | 7:17 pm | 1,514.82 | 0261 |
| 2318 | Indiana | 10/18/16 | 7:19 pm | 1,514.82 | 0261 |
| 2318 | Indiana | 10/18/16 | 7:25 pm | 1,514.82 | 5950 |
| 2318 | Indiana | 10/18/16 | 7:27 pm | 1,514.82 | 5950 |
| 2318 | Indiana | 10/18/16 | 7:30 pm | 1,514.82 | 8362 |

27. On or about October 18, 2016, OD WILLIAMS and one or more co-conspirator(s) used cloned HSBC credit cards at Walmart store #2502, located at 100 Colony Lane, Latrobe, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2502 | Latrobe | 10/18/16 | 8:53 pm | 1,520.62 | 3768 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2502 | Latrobe | 10/18/16 | 8:55 pm | 1,514.82 | 3768 |
| 2502 | Latrobe | 10/18/16 | 8:58 pm | 1,514.82 | 0967 |
| 2502 | Latrobe | 10/18/16 | 9:00 pm | 1,514.82 | 0967 |
| 2502 | Latrobe | 10/18/16 | 9:03 pm | 1,525.11 | 0967 |

28. On or about October 18, 2016, OD WILLIAMS and one or more co-conspirator(s) used cloned HSBC credit cards at Walmart store #2059, located at 2200 Greengate Center Circle, Greensburg, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2059 | Greensburg | 10/18/16 | 9:43 pm | 1,514.82 | 3679 |
| 2059 | Greensburg | 10/18/16 | 9:46 pm | 1,514.82 | 0967 |

29. On or about October 18, 2016, OD WILLIAMS and one or more co-conspirator(s) used cloned HSBC credit cards at Walmart store #5241, located at 915 Mills Drive, North Huntingdon, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|------------------|-------------|-------------|------------------------|-----------------------|
| 5241 | North Huntingdon | 10/18/16 | 10:09 pm | 1,514.82 | 3679 |
| 5241 | North Huntingdon | 10/18/16 | 10:12 pm | 1,514.82 | 3679 |
| 5241 | North Huntingdon | 10/18/16 | 10:16 pm | 1,514.82 | 3679 |
| 5241 | North Huntingdon | 10/18/16 | 10:20 pm | 1,514.82 | 3679 |
| 5241 | North Huntingdon | 10/18/16 | 10:23 pm | 1,514.82 | 3679 |
| 5241 | North Huntingdon | 10/18/16 | 10:25 pm | 1,514.82 | 3679 |

30. On or about October 18, 2016, OD WILLIAMS and one or more co-conspirator(s) used cloned HSBC credit cards at Walmart store #2588, located at 100 Walmart Drive, North Versailles, Pennsylvania, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|------------------|-------------|-------------|------------------------|-----------------------|
| 2588 | North Versailles | 10/18/16 | 10:52 pm | 1,514.82 | 8659 |
| 2588 | North Versailles | 10/18/16 | 10:55 pm | 1,543.52 | 3578 |
| 2588 | North Versailles | 10/18/16 | 10:57 pm | 1,514.82 | 3578 |
| 2588 | North Versailles | 10/18/16 | 10:59 pm | 1,514.82 | 3578 |
| 2588 | North Versailles | 10/18/16 | 11:00 pm | 1,514.82 | 3578 |

November 19, 2016: St. Louis

31. On or about November 19, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Bay Federal Credit Union and Commerce Bank credit cards at Walmart store #5150, located at 1900 Maplewood Commons Drive, Maplewood, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|-----------|----------|----------|-----------------|----------------|
| 5150 | Maplewood | 11/19/16 | 10:11 am | 1,009.88 | 7026 |
| 5150 | Maplewood | 11/19/16 | 10:14 am | 1,009.88 | 1675 |
| 5150 | Maplewood | 11/19/16 | 10:19 am | 1,514.82 | 6608 |
| 5150 | Maplewood | 11/19/16 | 10:27 am | 1,514.82 | 7401 |
| 5150 | Maplewood | 11/19/16 | 10:31 am | 1,564.07 | 9680 |

32. On or about November 19, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Commerce Bank credit cards at Walmart store #2616, located at 1307 Highway K, O Fallon, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|----------|----------|----------|-----------------|----------------|
| 2616 | O Fallon | 11/19/16 | 11:49 am | 1,031.44 | 9680 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2616 | O Fallon | 11/19/16 | 11:54 am | 1,014.92 | 9269 |
| 2616 | O Fallon | 11/19/16 | 11:57 am | 1,514.82 | 1072 |
| 2616 | O Fallon | 11/19/16 | 12:00 pm | 1,514.82 | 1072 |

33. On or about November 19, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Commerce Bank credit cards at Walmart store #5313, located at 6100 Ronald Reagan Drive, Lake Saint Louis, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|------------------|-------------|-------------|------------------------|-----------------------|
| 5313 | Lake Saint Louis | 11/19/16 | 1:12 pm | 1,009.88 | 0376 |
| 5313 | Lake Saint Louis | 11/19/16 | 1:16 pm | 1,009.88 | 3827 |
| 5313 | Lake Saint Louis | 11/19/16 | 1:22 pm | 1,009.88 | 2672 |

34. On or about November 19, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Commerce Bank credit cards at Walmart store #243, located at 1971 Wentzville Parkway, Wentzville, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 243 | Wentzville | 11/19/16 | 1:57 pm | 1,042.33 | 4907 |
| 243 | Wentzville | 11/19/16 | 1:59 pm | 1,514.82 | 7762 |
| 243 | Wentzville | 11/19/16 | 2:00 pm | 1,121.25 | 7256 |
| 243 | Wentzville | 11/19/16 | 2:01 pm | 1,514.82 | 7762 |
| 243 | Wentzville | 11/19/16 | 2:03 pm | 1,009.88 | 9393 |
| 243 | Wentzville | 11/19/16 | 2:05 pm | 1,009.88 | 7569 |
| 243 | Wentzville | 11/19/16 | 2:05 pm | 1,914.82 | 0103 |
| 243 | Wentzville | 11/19/16 | 2:12 pm | 1,914.82 | 0103 |
| 243 | Wentzville | 11/19/16 | 2:15 pm | 1,989.82 | 7870 |
| 243 | Wentzville | 11/19/16 | 2:20 pm | 1,989.82 | 7870 |
| 243 | Wentzville | 11/19/16 | 2:23 pm | 1,989.82 | 9573 |
| 243 | Wentzville | 11/19/16 | 2:26 pm | 1,604.94 | 9573 |

35. On or about November 19, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Commerce Bank credit cards at Walmart store #1161, located at 2897 Veterans Memorial Parkway, Saint Charles, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|---------------|----------|---------|-----------------|----------------|
| 1161 | Saint Charles | 11/19/16 | 3:03 pm | 1,919.76 | 0097 |
| 1161 | Saint Charles | 11/19/16 | 3:08 pm | 1,209.88 | 0097 |
| 1161 | Saint Charles | 11/19/16 | 3:12 pm | 1,514.82 | 0097 |

November 26 & 29, 2016: Raleigh and Fayetteville, North Carolina

36. On or about November 26, 2016, AATIF BROWN and DENICO ADAMS used a cloned Forum Credit Union credit card ending in 2370 at Walmart store #3889, located at 3151 Apex Peakway, Apex, North Carolina, to purchase \$1,009.88 in items without the authorization of the true account holder.

37. On or about November 26, 2016, AATIF BROWN and DENICO ADAMS used a cloned Bay Federal Credit Union credit card ending in 9151 at Walmart store #4458, located at 7016 Gb Alford Highway, Holly Springs, North Carolina, to purchase \$1,009.88 in items without the authorization of the true account holder.

38. On or about November 26, 2016, AATIF BROWN and DENICO ADAMS used cloned Forum Credit Union credit cards at Walmart store #5046, located at 805 Town Center Boulevard, Clayton, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5046 | Clayton | 11/26/16 | 11:15 pm | 1,009.88 | 9537 |
| 5046 | Clayton | 11/26/16 | 11:20 pm | 1,009.88 | 1567 |

39. On or about November 29, 2016, AATIF BROWN and DENICO ADAMS used cloned Compass Bank and Forum Credit Union credit cards at Walmart store #6879, located at 2820 Gillespie Street, Fayetteville, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 6879 | Fayetteville | 11/29/16 | 7:21 pm | 1,009.88 | 9313 |
| 6879 | Fayetteville | 11/29/16 | 7:24 pm | 1,514.82 | 2298 |
| 6879 | Fayetteville | 11/29/16 | 7:28 pm | 1,514.82 | 9679 |

40. On or about November 29, 2016, AATIF BROWN and DENICO ADAMS used cloned Forum Credit Union credit cards at Walmart store #2929, located at 3030 North Main Street, Hope Mills, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2929 | Hope Mills | 11/29/16 | 7:53 pm | 1,009.88 | 0569 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2929 | Hope Mills | 11/29/16 | 7:56 pm | 1,009.88 | 1976 |
| 2929 | Hope Mills | 11/29/16 | 7:58 pm | 1,009.88 | 3943 |
| 2929 | Hope Mills | 11/29/16 | 8:01 pm | 1,009.88 | 5090 |
| 2929 | Hope Mills | 11/29/16 | 8:06 pm | 1,009.88 | 3140 |

41. On or about November 29, 2016, AATIF BROWN and DENICO ADAMS used a cloned Forum Credit Union credit card ending in 2461 at Walmart store #3595, located at 7701 South Raeford Road, Fayetteville, North Carolina, to purchase \$1,009.88 in items without the authorization of the true account holder.

42. On or about November 29, 2016, AATIF BROWN and DENICO ADAMS used cloned Compass Bank and Forum Credit Union credit cards at Walmart store #5787, located at 4545 Fayetteville Road, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5787 | Raeford | 11/29/16 | 9:19 pm | 1,017.89 | 2181 |
| 5787 | Raeford | 11/29/16 | 9:21 pm | 1,009.88 | 2000 |
| 5787 | Raeford | 11/29/16 | 9:23 pm | 1,009.88 | 4579 |
| 5787 | Raeford | 11/29/16 | 9:25 pm | 1,009.88 | 5531 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5787 | Raeford | 11/29/16 | 9:30 pm | 1,009.88 | 3244 |

December 2, 2016: Louisville

43. On or about December 2, 2016, ANTHONY ADAMS and DEVIN SIMMONS used cloned Forum Credit Union and Star Bank credit cards at Walmart store #5418, located at 2020 Bashford Manor Lane, Louisville, Kentucky to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5418 | Louisville | 12/2/16 | 2:29 pm | 1,010.47 | 0494 |
| 5418 | Louisville | 12/2/16 | 2:33 pm | 1,515.41 | 7011 |

44. On or about December 2, 2016, ANTHONY ADAMS and DEVIN SIMMONS used cloned Bay Federal Credit Union, Star Bank, and Wells Fargo Bank credit cards at Walmart store #589, located at 11901 Standiford Plaza Drive, Louisville, Kentucky, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 589 | Louisville | 12/2/16 | 4:20 pm | 1,009.88 | 6693 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 589 | Louisville | 12/2/16 | 4:22 pm | 1,989.82 | 7936 |
| 589 | Louisville | 12/2/16 | 4:23 pm | 1,514.82 | 0691 |
| 589 | Louisville | 12/2/16 | 4:26 pm | 1,514.82 | 4285 |
| 589 | Louisville | 12/2/16 | 4:28 pm | 1,514.82 | 8782 |
| 589 | Louisville | 12/2/16 | 4:29 pm | 1,969.76 | 2755 |
| 589 | Louisville | 12/2/16 | 4:39 pm | 1,969.76 | 1969 |
| 589 | Louisville | 12/2/16 | 4:46 pm | 1,994.76 | 5034 |
| 589 | Louisville | 12/2/16 | 4:50 pm | 1,999.76 | 0363 |
| 589 | Louisville | 12/2/16 | 4:55 pm | 1,999.76 | 9886 |
| 589 | Louisville | 12/2/16 | 4:58 pm | 1,999.76 | 1605 |
| 589 | Louisville | 12/2/16 | 5:03 pm | 1,999.76 | 6602 |
| 589 | Louisville | 12/2/16 | 5:17 pm | 1,264.66 | 0601 |

December 5, 2016: Greensboro, North Carolina

45. On or about December 5, 2016, ANTHONY ADAMS, TORIANO ADAMS, and DEVIN SIMMONS used cloned HSBC Bay Federal Credit Union and Star Bank credit cards at Walmart store #1552, located at 323 South Arlington

Street, Salisbury, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1552 | Salisbury | 12/5/16 | 1:37 pm | 1,530.74 | 5853 |
| 1552 | Salisbury | 12/5/16 | 1:40 pm | 1,514.82 | 3191 |
| 1552 | Salisbury | 12/5/16 | 1:40 pm | 1,514.82 | 5192 |
| 1552 | Salisbury | 12/5/16 | 1:43 pm | 1,514.82 | 5853 |
| 1552 | Salisbury | 12/5/16 | 1:49 pm | 1,994.74 | 2387 |

46. On or about December 5, 2016, ANTHONY ADAMS, TORIANO ADAMS, and DEVIN SIMMONS used cloned Star Bank credit cards at Walmart store #5320, located at 121 West Elmsley Street, Greensboro, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5320 | Greensboro | 12/5/16 | 2:59 pm | 1,717.23 | 3872 |
| 5320 | Greensboro | 12/5/16 | 3:04 pm | 1,969.76 | 3914 |
| 5320 | Greensboro | 12/5/16 | 3:09 pm | 1,969.76 | 3270 |
| 5320 | Greensboro | 12/5/16 | 3:12 pm | 1,969.76 | 0430 |

47. On or about December 5, 2016, ANTHONY ADAMS, TORIANO ADAMS, and DEVIN SIMMONS used cloned Compass Bank and Star Bank credit cards at Walmart store #5393, located at 1050 Alamance Church Road, Greensboro, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5393 | Greensboro | 12/5/16 | 3:35 pm | 1,999.76 | 7176 |
| 5393 | Greensboro | 12/5/16 | 3:35 pm | 1,516.93 | 1583 |
| 5393 | Greensboro | 12/5/16 | 3:38 pm | 1,999.76 | 7176 |
| 5393 | Greensboro | 12/5/16 | 3:41 pm | 1,543.12 | 3726 |
| 5393 | Greensboro | 12/5/16 | 3:46 pm | 1,596.70 | 3528 |
| 5393 | Greensboro | 12/5/16 | 3:46 pm | 1,255.88 | 1919 |
| 5393 | Greensboro | 12/5/16 | 3:49 pm | 1,969.70 | 0746 |
| 5393 | Greensboro | 12/5/16 | 3:54 pm | 1,969.76 | 2825 |

48. On or about December 5, 2016, ANTHONY ADAMS, TORIANO ADAMS, and DEVIN SIMMONS used cloned Compass Bank and Star Bank credit cards at Walmart store #1842, located at 4424 West Wendover Avenue,

Greensboro, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1842 | Greensboro | 12/5/16 | 4:33 pm | 1,909.88 | 5926 |
| 1842 | Greensboro | 12/5/16 | 4:36 pm | 1,969.76 | 1751 |
| 1842 | Greensboro | 12/5/16 | 4:41 pm | 1,969.76 | 4953 |

December 16, 2016: Charlotte, North Carolina

49. On or about December 16, 2016, TORIANO ADAMS and DEVIN SIMMONS used cloned HSBC and Star Bank credit cards at Walmart store #5085, located at 701 Hawley Avenue, Belmont, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5085 | Belmont | 12/16/16 | 6:51 pm | 1,009.88 | 9205 |
| 5085 | Belmont | 12/16/16 | 6:54 pm | 1,036.52 | 6233 |
| 5085 | Belmont | 12/16/16 | 6:57 pm | 1,052.49 | 8086 |

50. On or about December 16, 2016, TORIANO ADAMS and DEVIN SIMMONS used a cloned HSBC credit card ending in 6934 at Walmart store

#5298, located at 223 North Myrtle School Road, Gastonia, North Carolina, to purchase \$1,019.99 in items without the authorization of the true account holder.

51. On or about December 16, 2016, TORIANO ADAMS and DEVIN SIMMONS used cloned Star Bank credit cards at Walmart store #7062, located at 2324 South New Hope Road, Gastonia, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 7062 | Gastonia | 12/16/16 | 8:49 pm | 1,004.94 | 1487 |
| 7062 | Gastonia | 12/16/16 | 8:59 pm | 1,209.88 | 3788 |

52. On or about December 16, 2016, TORIANO ADAMS and DEVIN SIMMONS used cloned Star Bank and Compass Bank credit cards at Walmart store #5481, located at 9820 Callabridge Court, Charlotte, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 5481 | Charlotte | 12/16/16 | 9:42 pm | 1,371.12 | 9183 |
| 5481 | Charlotte | 12/16/16 | 9:59 pm | 1,009.88 | 1550 |

53. On or about December 16, 2016, TORIANO ADAMS and DEVIN SIMMONS used cloned Star Bank credit cards at Walmart store #2134, located at

7735 North Tryon Street, Charlotte, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2134 | Charlotte | 12/16/16 | 11:54 pm | 1,010.95 | 0939 |
| 2134 | Charlotte | 12/16/16 | 11:57 pm | 1,033.84 | 8183 |

December 18 & 20, 2016: Baltimore

54. On or about December 18, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Fidelity credit cards at Walmart store #2290, located at 9750 Reistertown Road A, Owings Mills, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 2290 | Owings Mills | 12/18/16 | 3:43 pm | 1,014.85 | 8226 |
| 2290 | Owings Mills | 12/18/16 | 3:47 pm | 1,009.88 | 8226 |
| 2290 | Owings Mills | 12/18/16 | 3:49 pm | 1,764.82 | 2744 |
| 2290 | Owings Mills | 12/18/16 | 3:54 pm | 1,969.76 | 1788 |
| 2290 | Owings Mills | 12/18/16 | 4:01 pm | 1,969.76 | 7828 |
| 2290 | Owings Mills | 12/18/16 | 4:06 pm | 1,969.76 | 1604 |
| 2290 | Owings Mills | 12/18/16 | 4:16 pm | 1,988.72 | 4512 |

| | | | | | |
|------|--------------|----------|---------|----------|------|
| 2290 | Owings Mills | 12/18/16 | 4:26 pm | 1,999.76 | 7421 |
| 2290 | Owings Mills | 12/18/16 | 4:30 pm | 1,999.76 | 9857 |

55. On or about December 18, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Fidelity credit cards at Walmart store #3804, located at 8730 Liberty Road, Randallstown, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 3804 | Randallstown | 12/18/16 | 5:06 pm | 1,514.82 | 7230 |
| 3804 | Randallstown | 12/18/16 | 5:10 pm | 1,015.15 | 5810 |
| 3804 | Randallstown | 12/18/16 | 5:19 pm | 1,010.91 | 2009 |
| 3804 | Randallstown | 12/18/16 | 5:19 pm | 1,969.76 | 1348 |
| 3804 | Randallstown | 12/18/16 | 5:24 pm | 1,009.88 | 5545 |
| 3804 | Randallstown | 12/18/16 | 5:32 pm | 1,514.82 | 6950 |
| 3804 | Randallstown | 12/18/16 | 5:44 pm | 1,969.76 | 2353 |

56. On or about December 18, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Fidelity credit cards at Walmart store #2248, located at 6205 Baltimore National Pike, Catonsville, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2248 | Catonsville | 12/18/16 | 7:32 pm | 1,969.76 | 6206 |
| 2248 | Catonsville | 12/18/16 | 7:37 pm | 1,969.76 | 0742 |

57. On or about December 20, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Fidelity, Fifth Third Bank, and Westpac Banking Corporation credit cards at Walmart store #2290, located at 9750 Reistertown Road A, Owings Mills, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 2290 | Owings Mills | 12/20/16 | 12:05 pm | 1,792.50 | 4970 |
| 2290 | Owings Mills | 12/20/16 | 12:08 pm | 1,062.50 | 1302 |
| 2290 | Owings Mills | 12/20/16 | 12:16 pm | 1,613.75 | 4806 |
| 2290 | Owings Mills | 12/20/16 | 12:20 pm | 1,953.72 | 4518 |
| 2290 | Owings Mills | 12/20/16 | 12:34 pm | 1,964.82 | 4661 |

58. On or about December 20, 2016, ANTHONY ADAMS and RODNEY GIST used cloned Fidelity, Star Bank, and Westpac Banking Corporation credit cards at Walmart store #3804, located at 8730 Liberty Road,

Randallstown, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 3804 | Randallstown | 12/20/16 | 1:23 pm | 1,988.81 | 3167 |
| 3804 | Randallstown | 12/20/16 | 1:45 pm | 1,988.38 | 7850 |
| 3804 | Randallstown | 12/20/16 | 1:51 pm | 1,969.76 | 4232 |
| 3804 | Randallstown | 12/20/16 | 2:01 pm | 1,969.76 | 9827 |

59. On or about December 20, 2016, ANTHONY ADAMS and RODNEY GIST used cloned First Niagara Bank and Westpac Banking Corporation credit cards at Walmart store #2248, located at 6205 Baltimore National Pike, Catonsville, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2248 | Catonsville | 12/20/16 | 2:50 pm | 1,969.76 | 6450 |
| 2248 | Catonsville | 12/20/16 | 2:56 pm | 1,969.76 | 8672 |
| 2248 | Catonsville | 12/20/16 | 2:59 pm | 1,969.76 | 0705 |
| 2248 | Catonsville | 12/20/16 | 3:04 pm | 1,969.76 | 4796 |
| 2248 | Catonsville | 12/20/16 | 3:08 pm | 1,969.76 | 2779 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2248 | Catonsville | 12/20/16 | 3:11 pm | 1,969.76 | 5063 |
| 2248 | Catonsville | 12/20/16 | 3:16 pm | 1,969.76 | 1889 |

December 22, 2016: St. Louis

60. On or about December 22, 2016, AATIF BROWN and DENICO ADAMS used cloned Bay Federal Credit Union and Compass Bank credit cards at Walmart store #172, located at 1701 A Roy Drive, Washington, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 172 | Washington | 12/22/16 | 12:43 pm | 1,009.88 | 7452 |
| 172 | Washington | 12/22/16 | 12:48 pm | 1,558.03 | 3663 |
| 172 | Washington | 12/22/16 | 12:51 pm | 1,619.76 | 8213 |
| 172 | Washington | 12/22/16 | 12:53 pm | 1,514.82 | 4268 |

61. On or about December 22, 2016, AATIF BROWN and DENICO ADAMS used cloned Bay Federal Credit Union and HSBC credit cards at Walmart store #99, located at 1445 East Central Court, Union, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 99 | Union | 12/22/16 | 2:40 pm | 1,014.23 | 3973 |
| 99 | Union | 12/22/16 | 2:42 pm | 1,009.88 | 2021 |
| 99 | Union | 12/22/16 | 2:47 pm | 1,037.08 | 6918 |

62. On or about December 22, 2016, AATIF BROWN and DENICO ADAMS used cloned American Express and HSBC credit cards at Walmart store #25, located at 4820 South Clark Street, Mexico, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 25 | Mexico | 12/22/16 | 7:00 pm | 1,011.66 | 2007 |
| 25 | Mexico | 12/22/16 | 7:01 pm | 1,514.82 | 2839 |
| 25 | Mexico | 12/22/16 | 7:03 pm | 1,514.82 | 0004 |
| 25 | Mexico | 12/22/16 | 7:05 pm | 1,514.82 | 3783 |

63. On or about December 22, 2016, AATIF BROWN and DENICO ADAMS used cloned credit cards at Walmart store #51, located at 1701 North Bluff Street, Fulton, Missouri, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 51 | Fulton | 12/22/16 | 7:38 pm | 1,537.47 | 8756 |
| 51 | Fulton | 12/22/16 | 7:40 pm | 1,009.88 | 2649 |
| 51 | Fulton | 12/22/16 | 7:42 pm | 1,009.88 | 8418 |
| 51 | Fulton | 12/22/16 | 7:44 pm | 1,514.82 | 1273 |

December 26, 2016: Baltimore

64. On or about December 26, 2016, ANTHONY ADAMS and RODNEY GIST used cloned First Niagara Bank credit cards at Walmart store #3804, located at 8730 Liberty Road, Randallstown, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 3804 | Randallstown | 12/26/16 | 3:31 pm | 1,969.76 | 4008 |
| 3804 | Randallstown | 12/26/16 | 3:37 pm | 1,969.76 | 6559 |
| 3804 | Randallstown | 12/26/16 | 3:46 pm | 1,969.56 | 2550 |
| 3804 | Randallstown | 12/26/16 | 3:50 pm | 1,969.76 | 6787 |
| 3804 | Randallstown | 12/26/16 | 3:54 pm | 1,969.76 | 0053 |
| 3804 | Randallstown | 12/26/16 | 4:07 pm | 1,969.76 | 6766 |
| 3804 | Randallstown | 12/26/16 | 4:11 pm | 1,011.98 | 0948 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|------------------------|-----------------------|
| 3804 | Randallstown | 12/26/16 | 4:14 pm | 1,009.88 | 8940 |
| 3804 | Randallstown | 12/26/16 | 4:18 pm | 1,009.88 | 3674 |
| 3804 | Randallstown | 12/26/16 | 4:21 pm | 1,009.88 | 5320 |

65. On or about December 26, 2016, ANTHONY ADAMS and RODNEY GIST used cloned First Niagara Bank and First National Bank Alaska credit cards at Walmart store #1875, located at 407 George Clauss Boulevard, Severn, Maryland, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1875 | Severn | 12/26/16 | 8:16 pm | 1,969.76 | 7447 |
| 1875 | Severn | 12/26/16 | 8:19 pm | 1,969.76 | 7447 |
| 1875 | Severn | 12/26/16 | 8:21 pm | 1,969.76 | 7447 |
| 1875 | Severn | 12/26/16 | 8:26 pm | 1,969.76 | 0539 |
| 1875 | Severn | 12/26/16 | 8:26 pm | 1,527.89 | 8931 |
| 1875 | Severn | 12/26/16 | 8:29 pm | 1,514.82 | 2839 |
| 1875 | Severn | 12/26/16 | 8:36 pm | 1,705.56 | 6074 |
| 1875 | Severn | 12/26/16 | 8:38 pm | 1,514.82 | 9180 |

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1875 | Severn | 12/26/16 | 8:41 pm | 1,969.76 | 4195 |
| 1875 | Severn | 12/26/16 | 8:48 pm | 1,969.76 | 4207 |

December 30, 2016: Charlotte

66. On or about December 30, 2016, ANTHONY ADAMS, RODNEY GIST, and OD WILLIAMS used cloned Fidelity and Star Bank credit cards at Walmart store #2134, located at 7735 North Tryon Street, Charlotte, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2134 | Charlotte | 12/30/16 | 11:17 am | 2,019.76 | 0467 |
| 2134 | Charlotte | 12/30/16 | 11:30 am | 2,030.96 | 1332 |
| 2134 | Charlotte | 12/30/16 | 11:39 am | 2,019.76 | 5869 |

67. On or about December 30, 2016, ANTHONY ADAMS, RODNEY GIST, and OD WILLIAMS used a cloned credit card ending in 4970 at Walmart store #4574, located at 5825 Thunder Road NW, Concord, North Carolina, to purchase \$2,524.70 in items without the authorization of the true account holder.

68. On or about December 30, 2016, ANTHONY ADAMS, RODNEY GIST, and OD WILLIAMS used cloned Fidelity credit cards at Walmart store

#1027, located at 150 Concord Commons Plaza SW, Concord, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 1027 | Concord | 12/30/16 | 1:19 pm | 1,514.82 | 2011 |
| 1027 | Concord | 12/30/16 | 1:25 pm | 1,514.82 | 3141 |

69. On or about December 30, 2016, ANTHONY ADAMS, RODNEY GIST, and OD WILLIAMS used cloned Star Bank credit cards at Walmart store #2005, located at 2420 Supercenter Drive NE, Kannapolis, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
| 2005 | Kannapolis | 12/30/16 | 2:06 pm | 1,514.82 | 6375 |
| 2005 | Kannapolis | 12/30/16 | 2:15 pm | 1,514.82 | 8027 |

70. On or about December 30, 2016, DEVIN SIMMONS and TORIANO ADAMS used cloned Fidelity credit cards at Walmart store #1452, located at 3209 Pineville-Matthews Road, Charlotte, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|------------------------|-----------------------|
|--------------|-------------|-------------|-------------|------------------------|-----------------------|

| | | | | | |
|------|-----------|----------|---------|----------|------|
| 1452 | Charlotte | 12/30/16 | 6:07 pm | 1,039.45 | 8989 |
| 1452 | Charlotte | 12/30/16 | 6:09 pm | 1,012.16 | 9424 |

71. On or about December 30, 2016, DEVIN SIMMONS and TORIANO ADAMS used cloned Star Bank and U.S. Bank credit cards at Walmart store #4149, located at 7421 East Independence Boulevard, Charlotte, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|-----------|----------|---------|-----------------|----------------|
| 4149 | Charlotte | 12/30/16 | 8:46 pm | 1,015.34 | 1836 |
| 4149 | Charlotte | 12/30/16 | 8:50 pm | 1,024.69 | 0434 |
| 4149 | Charlotte | 12/30/16 | 8:55 pm | 1,009.88 | 5115 |
| 4149 | Charlotte | 12/30/16 | 9:01 pm | 1,009.88 | 5227 |

72. On or about December 30, 2016, DEVIN SIMMONS and TORIANO ADAMS used cloned U.S. Bank credit cards at Walmart store #4148, located at 8800 East WT Harris Boulevard, Charlotte, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|-----------|----------|---------|-----------------|----------------|
| 4148 | Charlotte | 12/30/16 | 9:39 pm | 1,000.00 | 2072 |

| | | | | | |
|------|-----------|----------|---------|----------|------|
| 4148 | Charlotte | 12/30/16 | 9:44 pm | 1,013.74 | 0760 |
|------|-----------|----------|---------|----------|------|

73. On or about December 30, 2016, ANTHONY ADAMS, RODNEY GIST, and OD WILLIAMS used cloned American Express credit cards at Walmart store #2134, located at 7735 North Tryon Street, Charlotte, North Carolina, to purchase items without the authorization of the true account holder(s):

| Store | City | Date | Time | Purchase Amount | Account Number |
|-------|-----------|----------|----------|-----------------|----------------|
| 2134 | Charlotte | 12/30/16 | 11:28 pm | 1,013.05 | 5601 |
| 2134 | Charlotte | 12/30/16 | 11:35 pm | 1,013.36 | 2007 |

Summer 2017: American Express

74. In or about the summer of 2017, DEVIN SIMMONS arranged to obtain cloned American Express credit cards from TAYAN JACKSON to use instead of cloned VISA or MasterCard credit cards.

75. In or about September 2017, TAYAN JACKSON supplied DEVIN SIMMONS with cloned American Express credit cards to use at Walmart stores to purchase gift cards.

September 11, 2017: Arkansas

76. On or about September 11, 2017, TORIANO ADAMS and DEVIN SIMMONS traveled from Detroit, Michigan, to Fayetteville, Arkansas.

77. TORIANO ADAMS rented a gray 2017 Dodge Caravan from Enterprise Rental Car and drove to Walmart store #6953, located at 1800 East Centerton Boulevard, Centerton, Arkansas.

78. Without the authorization of the true account holder, TORIANO ADAMS and DEVIN SIMMONS tried to use a cloned American Express card ending in 3007 to purchase three Apple iTunes cards and two 12-month Apple Music gift cards for \$498, but it was declined. The Walmart employee then entered the account number and expiration date by hand, and the transaction succeeded.

79. Without the authorization of the true account holder, TORIANO ADAMS and DEVIN SIMMONS then proceeded to use the cloned American Express card ending in 3007 to purchase 24 Visa gift cards on which they loaded \$500 (each) in four separate transactions:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|-------|-----------|---------|---------|----------------------|-----------------|----------------|
| 6953 | Centerton | 9/11/17 | 1:12 pm | 2 | 1,009.88 | 3007 |
| 6953 | Centerton | 9/11/17 | 1:15 pm | 4 | 2,019.76 | 3007 |
| 6953 | Centerton | 9/11/17 | 1:20 pm | 9 | 4,544.46 | 3007 |
| 6953 | Centerton | 9/11/17 | 1:24 pm | 9 | 4,544.46 | 3007 |

80. TORIANO ADAMS and DEVIN SIMMONS left the store in Centerton, Arkansas, in the gray 2017 Dodge Caravan and drove to Walmart store #2686, located at 1703 East Central Avenue, Bentonville, Arkansas, where they attempted to use a cloned American Express card ending in 2001 to purchase various items without the authorization of the true account holder.

81. At some point that day, American Express reached out to S.D., a Florida resident and the true cardholder for the account ending in 2001. S.D. thereafter called American Express by cellular phone because she had lost electricity from Hurricane Irma and advised that she was in Florida, not Arkansas. S.D. asked American Express to deactivate the card ending in 2001 because she did not authorize the charges in Arkansas.

82. That same day, however, JACKSON also contacted American Express and provided sufficient information to navigate the customer security protocols (i.e., security questions) specific to the card ending in 2001. JACKSON asserted that the charges in Arkansas were legitimate and persuaded American Express to reactive the card. As a result, TORIANO ADAMS and DEVIN SIMMONS were able to continue to use the cloned card ending in 2001 to make additional fraudulent purchases in the Fayetteville, Arkansas area.

83. TORIANO ADAMS and DEVIN SIMMONS used the cloned American Express credit card ending in 2001 to purchase approximately \$75,000 in goods at five Walmart stores without the authorization of the true account holder. SIMMONS and ADAMS also used a cloned American Express card ending in 1004 to purchase roughly \$19,500 in items at two other Walmart stores without the authorization of the true account holder.

84. The items purchased by TORIANO ADAMS and DEVIN SIMMONS using the cloned American Express cards included numerous Visa gift cards on which they loaded \$500 each, as well as personal items including men's undershirts, socks, underwear, several boxes of popcorn chicken from the deli, a bag of Cheetos Hot Fries, two bags of Doritos, bottles of water, two AT&T prepaid cellular phones, movies and video games, and two boxes of Plan B emergency contraception, including:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|-------|-------------|---------|---------|----------------------|-----------------|----------------|
| 2686 | Bentonville | 9/11/17 | 2:04 pm | 4 | 2,196.26 | 2001 |
| 100 | Bentonville | 9/11/17 | 2:44 pm | 1 | 531.25 | 2001 |
| 100 | Bentonville | 9/11/17 | 2:49 pm | 1 | 916.33 | 2001 |
| 2741 | Bentonville | 9/11/17 | 3:21 pm | 1 | 598.32 | 2001 |

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|-------------------------------------|----------------------------|---------------------------|
| 2741 | Bentonville | 9/11/17 | 3:32 pm | 5 | 2,526.79 | 2001 |
| 2741 | Bentonville | 9/11/17 | 3:27 pm | 9 | 4,544.46 | 2001 |
| 2741 | Bentonville | 9/11/17 | 3:33 pm | 9 | 4,544.46 | 2001 |
| 2741 | Bentonville | 9/11/17 | 3:35 pm | 7 | 3,539.58 | 2001 |
| 3654 | Rogers | 9/11/17 | 4:41 pm | 1 | 504.94 | 2001 |
| 3654 | Rogers | 9/11/17 | 4:45 pm | 9 | 4,544.46 | 2001 |
| 3654 | Rogers | 9/11/17 | 4:50 pm | 9 | 4,544.46 | 2001 |
| 3654 | Rogers | 9/11/17 | 4:54 pm | 9 | 4,544.46 | 2001 |
| 3654 | Rogers | 9/11/17 | 5:58 pm | 5 | 2,532.15 | 2001 |
| 3654 | Rogers | 9/11/17 | 6:01 pm | 6 | 3,046.41 | 2001 |
| 5260 | Rogers | 9/11/17 | 6:27 pm | 4 | 2,150.52 | 2001 |
| 5260 | Rogers | 9/11/17 | 6:32 pm | 9 | 4,544.46 | 2001 |
| 5260 | Rogers | 9/11/17 | 6:36 pm | 9 | 4,544.46 | 2001 |
| 5260 | Rogers | 9/11/17 | 6:41 pm | 9 | 4,544.46 | 2001 |
| 4108 | Springdale | 9/11/17 | 7:25 pm | 9 | 4,793.20 | 2001 |
| 4108 | Springdale | 9/11/17 | 7:27 pm | 9 | 4,587.32 | 2001 |
| 4108 | Springdale | 9/11/17 | 7:30 pm | 9 | 4,579.78 | 2001 |

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|-------|----------------|---------|----------|----------------------|-----------------|----------------|
| 4108 | Springdale | 9/11/17 | 7:33 pm | 9 | 4,544.46 | 2001 |
| 359 | Fayetteville | 9/11/17 | 8:16 pm | 0 | 503.49 | 1004 |
| 359 | Fayetteville | 9/11/17 | 8:24 pm | 1 | 803.58 | 1004 |
| 359 | Fayetteville | 9/11/17 | 8:30 pm | 3 | 1,565.19 | 1004 |
| 359 | Fayetteville | 9/11/17 | 8:34 pm | 9 | 4,544.46 | 1004 |
| 359 | Fayetteville | 9/11/17 | 8:39 pm | 9 | 4,544.46 | 1004 |
| 359 | Fayetteville | 9/11/17 | 8:43 pm | 9 | 4,544.46 | 1004 |
| 4 | Siloam Springs | 9/11/17 | 10:17 pm | 2 | 1,099.09 | 1004 |
| 4 | Siloam Springs | 9/11/17 | 10:20 pm | | 1,514.82 | 1004 |

85. TORIANO ADAMS and DEVIN SIMMONS returned the gray 2017 Dodge Caravan to Enterprise Rental Car in Tulsa, Oklahoma, and traveled to Detroit, Michigan, with approximately 200 Visa gift cards. In total, TORIANO ADAMS and DEVIN SIMMONS spent \$104,654.03 at the Walmart stores using cloned American Express credit cards.

September 16, 2017: St. Louis

86. On or about September 16, 2017, TORIANO ADAMS traveled from Detroit, Michigan, to Springfield, Missouri.

87. TORIANO ADAMS rented a dark red 2018 Chrysler 300 from Enterprise Rental Car.

88. TORIANO ADAMS met DEVIN SIMMONS, who was driving a gray 2017 Dodge Caravan that he had rented from Enterprise Rental Car in St. Louis, Missouri. ADAMS and SIMMONS drove to Walmart store #99, located at 1445 East Central Court, Union, Missouri.

89. TORIANO ADAMS and DEVIN SIMMONS use a cloned American Express card ending in 5001 to purchase strawberries and numerous Visa gift cards on which they loaded \$500 (each) in five separate transactions, all without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|-------|-------|---------|----------|----------------------|-----------------|----------------|
| 99 | Union | 9/16/17 | 11:38 am | 3 | 1,514.82 | 5001 |
| 99 | Union | 9/16/17 | 11:41 am | 9 | 4,551.68 | 5001 |
| 99 | Union | 9/16/17 | 11:44 am | 9 | 4,544.46 | 5001 |
| 99 | Union | 9/16/17 | 11:46 am | 9 | 4,544.46 | 5001 |
| 99 | Union | 9/16/17 | 11:49 am | 9 | 4,544.46 | 5001 |

90. TORIANO ADAMS and DEVIN SIMMONS drove back to Springfield, Missouri, but stopped Walmart store #65, located at 350 Park Ridge

Road, Sullivan, Missouri. ADAMS and SIMMONS attempted to use the cloned American Express card ending in 5001 to purchase a box of popcorn chicken from the deli, Pepsi, and three Visa gift cards on which they wanted to load \$500 (each), but the card was declined. ADAMS and SIMMONS convinced the cashier to try the cloned American Express card ending in 5001 again and successfully purchased three Visa gift cards and a shirt, all without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|-----------------------------|------------------------|-----------------------|
| 65 | Sullivan | 9/16/17 | 12:51 pm | 3 | 1,531.05 | 5001 |

91. TORIANO ADAMS and DEVIN SIMMONS drove to Walmart store #101, located at 500 South Bishop Avenue, Rolla, Missouri. ADAMS and SIMMONS use a different cloned American Express card ending in 2009 to purchase a shirt, a bottle of water, and two Visa gift cards on which they loaded \$500 (each) without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|-----------------------------|------------------------|-----------------------|
| 101 | Rolla | 9/16/17 | 2:19 pm | 2 | 1,029.65 | 2009 |

92. TORIANO ADAMS and DEVIN SIMMONS drove to Walmart store #21, located at 185 Saint Robert Boulevard, St Robert, Missouri. ADAMS and SIMMONS used a cloned American Express card ending in 1002 to men's underwear and numerous Visa gift cards on which they loaded \$500 (each), all without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|-------|--------------|---------|---------|----------------------|-----------------|----------------|
| 21 | Saint Robert | 9/16/17 | 3:34 pm | 2 | 1,030.06 | 1002 |
| 21 | Saint Robert | 9/16/17 | 3:36 pm | 3 | 1,519.82 | 1002 |
| 21 | Saint Robert | 9/16/17 | 3:40 pm | 9 | 4,549.46 | 1002 |
| 21 | Saint Robert | 9/16/17 | 3:43 pm | 9 | 4,575.43 | 1002 |
| 21 | Saint Robert | 9/16/17 | 3:46 pm | 9 | 4,549.46 | 1002 |
| 21 | Saint Robert | 9/16/17 | 3:49 pm | 9 | 4,549.46 | 1002 |

93. DEVIN SIMMONS returned the gray 2017 Dodge Caravan to Enterprise Rental Car in Springfield, Missouri, at approximately 6:52 pm.

94. TORIANO ADAMS and DEVIN SIMMONS drove to Walmart store #2702, located at 1102 North Massey Boulevard, Nixa, Missouri. ADAMS and SIMMONS used a cloned American Express card ending in 1000 to purchase a

bottle of tea, a bottle of water, and numerous Visa gift cards on which they loaded \$500 (each), all without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|-------|------|---------|----------|----------------------|-----------------|----------------|
| 2702 | Nixa | 9/16/17 | 10:21 pm | 3 | 1,514.82 | 1000 |
| 2702 | Nixa | 9/16/17 | 10:26 pm | 4 | 2,023.06 | 1000 |

95. TORIANO ADAMS and DEVIN SIMMONS stopped when the cloned American Express card ending in 1000 was declined at 10:29 p.m. in an attempt to purchase four Visa gift cards for \$2,019.76.

96. TORIANO ADAMS and DEVIN SIMMONS returned the red 2018 Chrysler 300 to Enterprise Rental Car in Springfield, Missouri, the next morning, September 17, 2017, at 7:10 a.m. and traveled to Detroit, Michigan, with approximately 92 Visa gift cards. In total, TORIANO ADAMS and DEVIN SIMMONS spent \$48,591.91 at the Walmart stores using cloned American Express credit cards.

September 28, 2017: Arkansas

97. On or about September 28, 2017, TORIANO ADAMS and DEVIN SIMMONS traveled from Detroit, Michigan, to Fayetteville, Arkansas.

98. TORIANO ADAMS rented a gray 2017 Dodge Caravan from Enterprise Rental Car and drove to Walmart store #2744, located at 4900 Rogers Avenue, Fort Smith, Arkansas.

99. TORIANO ADAMS and DEVIN SIMMONS use a cloned American Express card ending in 2002 to purchase a box of popcorn chicken from the deli, grapes, a wrap, and a Visa gift card on which they loaded \$500, all without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|-------|------------|---------|---------|----------------------|-----------------|----------------|
| 2744 | Fort Smith | 9/28/17 | 4:30 pm | 1 | 517.94 | 2002 |

100. TORIANO ADAMS and DEVIN SIMMONS also tried to use the cloned American Express card ending in 2002 to purchase six additional Visa gift card on which they wanted to load \$500 (each), but the transaction failed.

101. TORIANO ADAMS and DEVIN SIMMONS drove to Walmart store #7242, located at 367 West Main Street, Farmington, Arkansas. ADAMS and SIMMONS used the cloned American Express credit card ending in 2002 to purchase items in two separate transactions, each without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|-----------------------------|------------------------|-----------------------|
| 7242 | Farmington | 9/28/17 | 7:26 pm | | 507.86 | 2002 |
| 7242 | Farmington | 9/28/17 | 7:31 pm | | 1,010.62 | 2002 |

102. TORIANO ADAMS and DEVIN SIMMONS drove to Walmart store #5737, located at 3475 Black Forest Drive, Fayetteville, Arkansas. ADAMS and SIMMONS used a cloned American Express credit card ending in 1003 to purchase 5 Visa gift cards on which they loaded \$500 (each) without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|--------------|--------------|-------------|-------------|-----------------------------|------------------------|-----------------------|
| 5737 | Fayetteville | 9/28/17 | 8:07 pm | 5 | 2,560.85 | 1003 |

103. TORIANO ADAMS and DEVIN SIMMONS drove to Walmart store #5260, located at 4208 South Pleasant Crossing Boulevard, Rogers, Arkansas. ADAMS and SIMMONS used a cloned American Express credit card ending in 2007 to purchase men's undershirts, underwear, a bottle of Mountain Dew, and Visa gift cards on which they loaded \$500 (each), all without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|-----------------------------|------------------------|-----------------------|
| 5260 | Rogers | 9/28/17 | 8:50 pm | 1 | 521.34 | 2007 |
| 5260 | Rogers | 9/28/17 | 8:58 pm | 1 | 554.60 | 2007 |
| 5260 | Rogers | 9/28/17 | 9:01 pm | 1 | 762.84 | 2007 |
| 5260 | Rogers | 9/28/17 | 9:06 pm | 8 | 4,039.52 | 2007 |
| 5260 | Rogers | 9/28/17 | 9:11 pm | 9 | 4,544.46 | 2007 |

104. TORIANO ADAMS and DEVIN SIMMONS drove to Walmart store #100, located at 406 South Walton Boulevard, Bentonville, Arkansas. ADAMS and SIMMONS used the cloned American Express credit card ending in 2007 to purchase items in four separate transactions, each without the authorization of the true account holder:

| Store | City | Date | Time | Number of Gift Cards | Purchase Amount | Account Number |
|--------------|-------------|-------------|-------------|-----------------------------|------------------------|-----------------------|
| 100 | Bentonville | 9/28/17 | 9:42 pm | | 504.94 | 2007 |
| 100 | Bentonville | 9/28/17 | 9:44 pm | | 526.80 | 2007 |
| 100 | Bentonville | 9/28/17 | 9:49 pm | | 4,552.88 | 2007 |
| 100 | Bentonville | 9/28/17 | 9:55 pm | | 196.71 | 2007 |

105. TORIANO ADAMS and DEVIN SIMMONS returned the gray 2017 Dodge Caravan to Enterprise Rental Car in Fayetteville, Arkansas, Missouri, the next morning, September 29, 2017, at 11:59 a.m. and traveled to Detroit, Michigan, with approximately 35 Visa gift cards. In total, TORIANO ADAMS and DEVIN SIMMONS spent \$21,309.82 at the Walmart stores using cloned American Express credit cards.

All in violation of 18 U.S.C. § 1349.

COUNT TWO
(18 U.S.C. § 1956(h) –
Conspiracy to Commit Money Laundering)

D-1 Toriano Adams
D-2 Anthony Adams
D-3 Devin Simmons
D-4 Aatif Brown
D-5 OD Williams
D-6 Denico Adams
D-7 Rodney Gist
D-8 Tayan Jackson

From in or about October 2016, through in or about September 2017, the exact dates being unknown to the grand jury, in the Eastern District of Michigan and elsewhere, the defendants, TORIANO ADAMS, ANTHONY ADAMS, DEVIN SIMMONS, AATIF BROWN, OD WILLIAMS, DENICO ADAMS, RODNEY GIST, and TAYAN JACKSON, together with others known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree to conduct financial transactions affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said unlawful activity and knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity.

Object of the Conspiracy

The object of the conspiracy was for the defendants to conceal and disguise the fraudulent proceeds from their use of cloned credit cards throughout the United States.

Manner and Means

In furtherance of the conspiracy, and to affect the object and purposes thereof, the defendants, and others known and unknown to the grand jury, used the following manner and means, including but not limited to the following:

1. The defendants traveled from the Detroit, Michigan metro area to retail stores throughout the United States where they used cloned credit cards to purchase legitimate gift cards and load the gift cards with U.S. currency funded by the cloned credit cards.
2. The defendants returned to the Detroit, Michigan metro area with the legitimate gift cards that represented proceeds of their fraudulent use of cloned credit cards throughout the United States.
3. The defendants used the legitimate gift cards to purchase items for personal use and pay for travel to and from the Detroit, Michigan metro area to conduct their fraudulent use of cloned credit cards.

4. The defendants also sold the legitimate gift cards to party stores in the Detroit, Michigan metro area to convert the proceeds from the cloned credit cards into cash.

All in violation of 18 U.S.C. § 1956(h) and 1956(a)(1)(B)(i).

COUNT THREE

(18 U.S.C. § 1029(a)(3) – Possession of
Fifteen or More Unauthorized Access Devices)

D-1 Toriano Adams

On or about October 10, 2016, the exact date being unknown to the grand jury, in the Eastern District of Michigan and elsewhere, the defendant, TORIANO ADAMS, knowingly and with intent to defraud, possessed fifteen or more counterfeit and unauthorized access devices, to wit: approximately 50 stolen credit card accounts issued by HSBC and other financial institutions, aid possession affecting interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(3) and (c)(1)(a)(i).

COUNTS FOUR – TWENTY-THREE

(18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

D-1 Toriano Adams
D-2 Anthony Adams
D-3 Devin Simmons
D-4 Aatif Brown
D-5 OD Williams
D-6 Denico Adams
D-7 Rodney Gist
D-8 Tayan Jackson

On or about the individual dates set forth below, the specified defendant(s) did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, HSBC and American Express credit card accounts set forth below, during and in relation to the conspiracy to commit wire fraud charged in Count One of this indictment, knowing that the means of identification belonged to another person:

| Count | Date | Defendant(s) | Account Number |
|--------------|-------------|------------------------------|-----------------------|
| 4 | 10/11/16 | Toriano Adams, Devin Simmons | 4957 |
| 5 | 10/12/16 | Anthony Adams, Aatif Brown | 6424 |
| 6 | 10/12/16 | Anthony Adams, Aatif Brown | 6918 |
| 7 | 10/13/16 | Anthony Adams, Aatif Brown | 0148 |
| 8 | 10/13/16 | Anthony Adams, Aatif Brown | 1461 |
| 9 | 10/16/16 | Denico Adams, Rodney Gist | 7031 |

| | | | |
|----|----------|---|------|
| 10 | 10/16/16 | Denico Adams, Rodney Gist | 6934 |
| 11 | 10/17/16 | Toriano Adams, Devin Simmons, OD Williams | 3885 |
| 12 | 10/17/16 | Toriano Adams, Devin Simmons, OD Williams | 1902 |
| 13 | 10/17/16 | Toriano Adams, Devin Simmons, OD Williams | 7739 |
| 14 | 10/17/16 | Toriano Adams, Devin Simmons, OD Williams | 5354 |
| 15 | 10/18/16 | Toriano Adams, Devin Simmons, OD Williams | 3679 |
| 16 | 10/18/16 | Toriano Adams, Devin Simmons, OD Williams | 0967 |
| 17 | 9/11/17 | Toriano Adams, Devin Simmons, Tayan Jackson | 2001 |
| 18 | 9/11/17 | Toriano Adams, Devin Simmons, Tayan Jackson | 1004 |
| 19 | 9/16/17 | Toriano Adams, Devin Simmons, Tayan Jackson | 5001 |
| 20 | 9/16/17 | Toriano Adams, Devin Simmons, Tayan Jackson | 1002 |
| 21 | 9/16/17 | Toriano Adams, Devin Simmons, Tayan Jackson | 1000 |
| 22 | 9/28/17 | Toriano Adams, Devin Simmons, Tayan Jackson | 1003 |
| 23 | 9/28/17 | Toriano Adams, Devin Simmons, Tayan Jackson | 2007 |

All in violation of 18 U.S.C. § 1028A(a)(1).

FORFEITURE ALLEGATION

1. As a result of the violations of Title 18, United States Code, Sections 1349 (conspiracy to commit wire fraud), 1956 (conspiracy to commit money laundering, and Section 1028A (aggravated identity theft), as set forth in Counts One and Two of this indictment, the defendants shall forfeit to the United States any property, real or personal, which constitutes, or is derived from, proceeds traceable to those violations, pursuant to 18 U.S.C. §§ 981(a)(1)(A), (C), and (D), 982(a)(2)(B), and 28 U.S.C. § 2461.

Such property includes, but is not limited to, a money judgment in an amount to be determined in United States currency and all traceable interest and proceeds for which the defendant is jointly and severally liable. Such sum in aggregate is property representing the proceeds of the aforementioned offenses, or money that was involved in the aforementioned offenses, or is traceable to such property, in violation of 18 U.S.C. §§ 1343, 1029(a)(2), 1028A(a)(1), and/or 1956(a)(1)(B)(i).

2. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), if any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2) and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

Dated: 9-20-18

s/Grand Jury Foreperson
Grand Jury Foreperson

MATTHEW SCHNEIDER
United States Attorney

s/Eric Straus
Eric Straus
Chief, Violent and Organized Crimes Unit

s/Shane Cralle
Shane Cralle
Assistant U.S. Attorney

s/James Drabick
James R. Drabick
Assistant U.S. Attorney

Case:2:18-cr-20641

Judge: Friedman, Bernard A.


MJ: Patti, Anthony P.

Filed: 09-20-2018 At 01:41 PM

SEALED MATTER (EK)

United States District Court
Eastern District of Michigan**Criminal Case Cc**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

| | |
|--|--|
| Companion Case Information | Companion Case Number: |
| This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : | Judge Assigned: |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | AUSA's Initials:  |

Case Title: USA v. Toriano Adams et al.County where offense occurred : Wayne County and elsewhereCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/____ Information --- no prior complaint.
☐ Indictment/____ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/____ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 20, 2018

Date


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 Assistant United States Attorney
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 Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.